

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Kansas City Power & Light)
Company's Notice of Intent to File an)
Application for Authority to Establish a Demand-) **File No. EO-2019-0132**
Side Programs Investment Mechanism)

In the Matter of KCP&L Greater Missouri Operations)
Company's Notice of Intent to File an)
Application for Authority to Establish a Demand-) **File No. EO-2019-0133**
Side Programs Investment Mechanism)

**STAFF MOTION FOR COMMISSION ORDER SHORTENING
RESPONSE TIMES FOR DATA REQUESTS**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, for its Motion for Commission Order Shortening Response Times for Data Requests ("Motion"), states as follows:

1. On November 29, 2018, Kansas City Power & Light Company ("KCPL") and KCP&L Greater Missouri Operations Company ("GMO") filed their application for Commission approval to conduct energy efficiency and demand response programs under the Missouri Energy Efficiency Investment Act (MEEIA) for the period April 1, 2019 through March 31, 2022 (referred to as MEEIA Cycle 3). Combined, the KCPL and GMO MEEIA Cycle 3 applications have a cost impact of nearly \$160 million to customers. Both KCPL and GMO applications proposed a procedural schedule which

requests a Commission order at 111 days, within the 120 days set by 4 CSR240-20.094(4)(H)¹.

2. On December 4, 2018, the Commission issued its *Order Directing Notice of Application and Order Setting Hearing* (Order). To accommodate Commission schedules, the Commission set the rebuttal filing date to January 8, 2019.

3. Staff further notes that workpapers were submitted by KCPL and GMO on December 3rd, with one set of workpapers submitted December 4th, further shortening the time Staff has to formulate its discovery requests and to review the applications.

4. Accordingly Staff moves the Commission issue an order directing that response times to data requests be shortened to 3 business days, with 1 business day to object, and to require any outstanding data requests as of the issue date of its discovery order to be responded to no later than 3 business days after the effective date of an order directing the 3 business day data request response and 1 business day objection periods. Staff is willing to work with parties should 3 business days not be sufficient time to respond to data requests that might require voluminous responses.

WHEREFORE, for the reasons stated above, the Staff respectfully requests that the Commission issue a discovery order reducing the data request response time period to 3 business days and the objection period to 1 business day, further requiring that any outstanding data requests as of the issue date of the Commission's order be responded to at the earlier of the 20 day response period under Commission rule or 3 business days from the issue date of the Commission's order.

¹ Staff points out that all previous KCPL and GMO MEEIA Cycle 1 and 2 cases, and Ameren Missouri MEEIA Cycle 1 and 2 cases took 180 days to process. Ameren MEEIA Cycle 3 took 150 days.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 4th day of December, 2018 to all counsel of record in this proceeding.

/s/ Robert S. Berlin